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Attorneys for Plaintiff

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ALASKA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

ELLIS FULTON KINGSEP,

Defendant.

No. 4:24-cr-00006-TMB-SAO

**SUPPLEMENT TO GOVERNMENT'S MOTION TO REVOKE ORDER OF  
RELEASE (DKT 5), FILED ON SHORTENED TIME**

The United States, by and through undersigned counsel, hereby submits this supplement to the Government's Motion to Revoke Order of Release, filed at docket 5.

On July 11, 2024, special agents of the Office of the Inspector General, Social Security Administration executed a search warrant at Defendant's storage unit in Los Angeles, California. Among other items, they located and seized:

1. Expired Canadian passport in defendant's name and images of defendant's valid Canadian passport (but no hard copy of current Canadian passport).

2. Materials to create Ecuadorian Passports and national IDs in defendant's name.
3. Documentation of gold/silver bullion transfers to foreign accounts, including Panama and Venezuela.
4. Folders containing foreign bank account statements and correspondence with financial institutions in Switzerland and Germany, including:

*Credit Suisse*

*Saxo Bank*

*Deloitte Bank*

5. The book *How to be Invisible* by J.J. Luna.
6. Two books on how to manufacture fake identification:

*How to Make Driver's Licenses and other IDs on Your Home Computer*

*Secrets of a Back Alley ID Man: Fake ID Construction Techniques of the Underground*

7. ID documents including original Social Security card and expired California driver's license in name of victim Leitha Aude, the Defendant's deceased mother.
8. UPS receipts showing payments for mail forwarding to Fairbanks, Alaska and La Quinta, California, as described in the Indictment.
9. Correspondence between social security administration and victim Leitha Aude, most recently in 2023.
10. Multiple photocopies of victim's signature.

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This evidence further supports the argument of the United States that defendant is a flight risk and should be detained and transported to the District of Alaska. He clearly has money overseas, and the ability to create false identification documents. The defendant is scheduled for release at 1400 PDT today.

RESPECTFULLY SUBMITTED July 11, 2024 at Anchorage, Alaska.

S. LANE TUCKER  
United States Attorney

/s THOMAS C. BRADLEY  
THOMAS C. BRADLEY  
Assistant United States Attorney  
United States of America

**CERTIFICATE OF SERVICE**

I hereby certify that on July 11, 2024 a true and correct copy of the foregoing was served electronically, via email, on all counsel of record.

/s THOMAS C. BRADLEY